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Attorneys for all Defendants

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

JANA ELHIFNY, individually,

Plaintiff,

v.

CINDA GIFFORD, et. al.

Defendants.

Case No. 3:04-CV-00583-LRH-PAL

**STIPULATION AND**  
**[PROPOSED] ORDER**  
**REGARDING DISCOVERY**

1 WHEREAS, under the Court's Order dated July 11, 2007 (Dkt. # 137), "Discovery shall  
2 be extended and shall be completed by May 30, 2008";

3 WHEREAS, under the Court's Order dated March 7, 2008 (Dkt. # 174), "Disclosures  
4 concerning experts shall be made on April 2, 2008," and "Disclosures respecting rebuttal reports  
5 shall be made within 30 days after the initial disclosure of experts";

6 WHEREAS, although the Parties have served and exchanged written discovery and have  
7 taken numerous fact depositions, they anticipate they will need additional time to complete all  
8 discovery based on the current deadlines; and

9 WHEREAS, the parties do not anticipate the stipulated extensions of time will otherwise  
10 affect the case schedule, especially in light of the parties' interlocutory appeal, which is currently  
11 pending before the United States Court of Appeals for the Ninth Circuit.

1 IT IS HEREBY STIPULATED THAT:

2 (1) Disclosures concerning experts shall be made on May 2, 2008.

3 (2) Disclosures respecting rebuttal experts shall be made within 30 days after the initial  
4 disclosure of experts.

5 (3) Last date to complete discovery shall be June 30, 2008.

6 IT IS SO STIPULATED.

7 Dated: March 31, 2008

O'MELVENY & MYERS LLP

9 By: /s/ David S. Almeling

10 David S. Almeling  
Attorneys for Plaintiff JANA ELHIFNY

11 Dated: March 31, 2008

MAUPIN, COX & LeGOY

13 By: /s/ Christopher D. Jaime

14 Christopher D. Jaime  
Attorneys for Defendants, CINDA GIFFORD,  
15 *et al.*

16 IT IS SO ORDERED:

17 

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19  
20 LARRY R. HICKS  
UNITED STATES DISTRICT JUDGE

21 SF1:710534.1

22 DATED: April 10, 2008